Appendix 3

Report by David Tucker Associates

Eastleigh Local Plan

Review of Transport Evidence Base

Prepared by Simon Tucker BSc (Hons) MCIHT

On behalf of ADD

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Eastleigh Local Plan

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Review of Transport Evidence Base
Prepared by Simon Tucker BSc (Hons) MCIHT
On matters of Transportation, Accessibility and Traffic Impact

6th August 2018
SJT/19247-02b_Final_Review of Transport Evidence Base

Prepared For:

ADD

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Appendices

1.0 Qualifications And Experience

1.1 My name is Simon John Tucker. I am a Director of DTA Transportation Ltd, Transportation Planning Consultants. The consultancy specialises in expert advice on transport related issues throughout a broad range of projects for both the public and private sector. In particular, expertise lies in evolving transportation strategies, identifying solutions and negotiating agreements.

1.2 I am a Member of the Chartered Institute of Highways and Transportation (CIHT), a graduate member of the Institution of Civil Engineers (ICE). I hold an Honours Degree in Civil Engineering from the University of Manchester.

1.3 I have 19 years' experience in the field of Transport Planning. I have prepared transport and traffic reviews, Transport Assessments and contributed to the process of Environmental Impact Assessment for a wide range of projects for both the public and private sector. I have appeared as an expert witness at numerous Section 78 and Local Plan Inquiries and Hearings.

1.4 My practice is based in the West Midlands and I have previously worked on numerous projects within and around Hampshire. I am well acquainted with the local area, the surrounding transport infrastructure network and the Hampshire County Council's (HCC) Transport Planning procedures and requirements.

1.5 I am also very well acquainted with the requirements and processes for undertaking Transport Assessment and Appraisal for major transport and infrastructure projects, having been involved in three major new port developments, NSIP applications for two new strategic highway links, the Birmingham Metro Extension and two linear infrastructure projects (pipelines).

2.0 Scope And Nature Of Report

2.1 This report has been prepared on behalf of ADD (Action Against Destructive Development) to review the current status and process of the transport modelling work undertaken as part of the evidence base for Eastleigh Local Plan.

2.2 This report considers the transport evidence base as submitted originally in draft in 2015 and the evidence base submitted alongside the Submission Local Plan in July 2018.

2.3 The report focuses on three key failings in the preparation of the Local Plan that can be broadly summarised as follows:

2.4 **The process undertaken by EBC to identify and test the appropriate level and location of development for the local plan was, and is, wholly flawed.**

2.5 An appropriate transport planning policy approach was not adopted in defining and determining development allocations. That process would have reviewed firstly an assessment of the need for any scheme (in this case housing allocations), then identification of potential options to meet that need, and then finally to confirm whether the chosen solution would meet the scheme objectives.

2.6 In this case the opposite was undertaken. EBC chose the location for development and then sought to set the evidence base around that strategy. That is wrong and runs contrary to the purpose of the process which is to allow proper consideration of alternatives to be assessed, by overall economic performance, against the benefits and dis-benefits of each option.

2.7 That position was clear in 2015 when the only substantive evidence submitted related to the SGO option and not to any other alternatives.

2.8 Further Transport Evidence has been submitted with the Submission Draft Local Plan which does assess other options in Transport terms. There remains a complete lack of proper transparent appraisal of overall costs and benefits of the options as required by the NPPG and Webtag. The process flaw identified back in 2015 remains unresolved. Although the options have now been assessed, the comparison is focused on individual impacts, with no attempt to assess the overall cumulative impacts / benefits.

2.9 Specifically on transport matters, the different options have not been assessed on a fair and even playing field. The chosen SGO is tested with a significantly higher level of mitigation than the other options. This unfairly and inappropriately favours the Local Plan chosen scheme.

2.10 Proper appraisal of the evidence confirms that in transport terms Options D and E perform better overall and better on most key transport planning objectives, the NPPG and NPPF.

2.11 **On the evidence submitted by the Authority therefore, the chosen option performs demonstrably worse than other available options. The Local Plan cannot therefore be considered sound in that respect.**

2.12 Even if the process and assessment flaws were resolved, the Local Plan completely fails to demonstrate how the infrastructure that the Council considers to be necessary to mitigate the development can or will be delivered in a timely manner.

2.13 A significant number of off-site improvement works are at present un-refined and in some cases completely unidentified. The Link Road is not identified in specific terms as to what is required and when. However there are significant transport, environmental planning, land ownership and funding constraints that prevent that road from coming forward with certainty at this stage. Ironically the proposed Policies specifically require and set a timescale for the delivery of the road. In the absence of any certainty that those can be met the whole Policy for the SGO is rendered uncertain and undeliverable.

2.14 A total of 7 junctions will have "severe" impacts. Mitigation at junctions identified as being essential (including M3J12 and the Allbrook Bridge) remain undefined and uncertain.

2.15 This is supported by the IDP which confirms that costs have not been allowed for these. It is also supported by the text of Policies S5 and S6 which require further assessment work to be undertaken. The policy details of S5 and S6 are also unsound in that there is no certainty they can be delivered in an NPPF compliant way.

2.16 **On that basis, the final failing of the local plan is that there is no certainty that the transport infrastructure specifically required to serve the SGO can or will be delivered. The plan is therefore considered unsound in relation to deliverability.**

2.17 The following sections set out specific failings and commentary on the submitted evidence base.

3.0 Transport Planning Approach and Policy

3.1 Process that should have been undertaken

3.1.1 In March 2012, the DCLG published the NPPF. The NPPF confirms that the Government will continue to encourage sustainable development and in relation to the transport issues it notes that:

> "Transport policies have an important role to play in facilitating sustainable development but also in contributing to wider sustainability and health objectives. Smarter use of technologies can reduce the need to travel. The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel.
> Para 29

3.1.2 In respect of Plan making, the Framework sets out that the key priorities for new development allocations should be to maximise accessibility and to, create safe and suitable access for all modes, and the provision of major infrastructure to accommodate development should be considered only as a last resort.

3.1.3 Paragraphs 32 and 35 set out below explicitly confirm this:

> "All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Plans and decisions should take account of whether:
> - the opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
> - safe and suitable access to the site can be achieved for all people; and
> - improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe".
>
> Para 32

> "Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to:
>
> - accommodate the efficient delivery of goods and supplies;
> - give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;
> - create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;
> - incorporate facilities for charging plug-in and other ultra-low emission vehicles; and

- consider the needs of people with disabilities by all modes of transport."

Para 35

3.1.4 The interpretation and implementation of these Policy requirements are confirmed in the National Planning Policy Guidance Notes. These are set out in full in **Appendix A**. The most pertinent elements of the requirements are summarised below:

"It is important for local planning authorities to undertake an assessment of the transport implications in developing or reviewing their Local Plan so that a robust transport evidence base may be developed to support the preparation and/or review of that Plan. A robust transport evidence base can facilitate approval of the Local Plan and reduce costs and delays to the delivery of new development, thus reducing the burden on the public purse and private sector."

Para 001

The key issues, which should be considered in developing a transport evidence base, include the need to:

- assess the existing situation and likely generation of trips over time by all modes and the impact on the locality in economic, social and environmental terms
- assess the opportunities to support a pattern of development that, where reasonable to do so, facilitates the use of sustainable modes of transport
- highlight and promote opportunities to reduce the need for travel where appropriate
- identify opportunities to prioritise the use of alternative modes in both existing and new development locations if appropriate
- consider the cumulative impacts of existing and proposed development on transport networks
- assess the quality and capacity of transport infrastructure and its ability to meet forecast demands
- identify the short, medium and long-term transport proposals across all modes

<u>The outcome could include assessing where alternative allocations or mitigation measures would improve the sustainability, viability and deliverability of proposed land allocations (including individual sites) provided these are compliant with national policy as a whole.</u>

3.1.5 Paragraph: 004 Reference ID: 54-004-20141010 goes onto to confirm that assessment should be undertaken at every stage of Local Plan progression thus:

- as part of the initial evidence base in terms of issues and opportunities
- as part of the options testing
- as part of the preparation of the final submission

3.1.6 Following this review, Paragraphs 008 -010 set out a comprehensive and thorough assessment process to ensure appropriate evidence to support any allocation, which

provides full consideration of all transport related implications including accessibility, highway safety, amenity and traffic impacts. Specifically, Paragraph 010 encourages the use of WebTAG to assess the development. For transport schemes, the approach requires as a fundamental starting point the need to identify objectives. In the context of a local plan that objective would be to determine the appropriate location and scale of housing allocation.

3.1.7 WebTAG would then require an assessment of all the possible alternatives to meet these against the key criteria of Environment, Social, Economy, and Public Accounts. The Guidance on WebTAG is clear that

> There must be a clear rationale for any proposal and it must be based on a clear presentation of problems and challenges that establish the 'need' for a project.
> There must be consideration of genuine, discrete options, and not an assessment of a previously selected option against some clearly inferior alternatives. A range of solutions should be considered across networks and modes.
> There should be an auditable and documented process which identifies the best performing options to be taken forward for further appraisal.
> There should be an appropriate level of public and stakeholder participation and engagement at suitable points in the process. In most cases this should inform the evidence-base which establishes the 'need' for an intervention, guide the option generation, sifting and assessment steps, as well as informing further appraisal in Stage 2.
>
> Para 1.1.5

3.1.8 The process requires firstly an assessment of the need for any scheme (in this case housing allocations), then to identify potential options to meet that need, and then finally to confirm whether it would meet the scheme objectives. The purpose of the output is that the process should be transparent and allow proper consideration of alternatives to be considered, by overall economic performance, against the benefits and dis-benefits of each option. The process is clearly set out on Figure 1 of **Appendix A** which is an extract from the TAG Guidance Appraisal Process Summary.

3.2 **Process that was undertaken**

3.2.1 As discussed below there is currently no evidence to suggest that the Council have sought to adopt any element of this approach.

3.2.2 In the introduction, the SGO June 2018 paper appears to suggest it has addressed a significant element of our previous criticism that it did not properly model and assess all options in terms of the wider traffic modelling. However, as discussed below the interpretation of the modelling approach is flawed and ultimately supports a SGO at D or E rather than B/C as suggested.

3.2.3 Furthermore, the report provides no robust overarching numerical assessment based on the NPPG requirements. It therefore remains flawed and inconclusive and the conclusions unsound.

3.2.4 Paragraph 6.3 suggests that:

> "The results of the transport model are summarised briefly in each section and set out more fully in the final section, to enable the technical interpretation regarding the model to be brought together in one place."

3.2.5 That is not clear at all from the documentation. The attempt at a summary in terms of Sustainability Appraisal confirms this at Table 38 / Para 6.189 :

> "The SA indicates that SGO B/C scores better or equal for most issues. SAs are intended as relatively strategic assessments. Where the SA scores SGO B/C as worse (and in some cases where it scores equal or better), further detailed assessment by the Council suggests the negatives associated with SGO B/C are less than first indicated. Overall the Council considers the SA supports the Council's assessment regarding transport and accessibility"

3.2.6 It is not clear where that further assessment can be found and indeed how that conclusion is validated. No weight can be given to that assertion.

4.0 Technical Comparison of Options

4.1 **Process that was undertaken**

4.1.1 Having concluded a significant failing in terms of the process that was followed, this section considers the details of the assessments that have been submitted and the extent to which they support the chosen growth strategy.

4.1.2 It focuses on the Transport Assessment dated 20/04/18 and the SGO Report June 2018. The work is suggested to compare various options for growth which are described thus:

- Baseline - forms the basis against which the proposed Local Plan development will be assessed
- DS1 – SGO sites B and C without the northern link road
- DS2 – SGO sites B and C with the northern link road. This is the Council's draft Local Plan option with an intermediate level of off-site infrastructure interventions
- DS3 – SGO sites B and C with the northern link road. This is the Council's draft Local Plan option with a high level of off-site infrastructure interventions
- DS4 – SGO site C without the northern link road
- DS5 - SGO site D
- DS6 – SGO site E
- DS7 – SGO site D and a small part of E.

4.2 Comparison of Public Transport Options

4.2.1 The Public Transport Section of the SGO Report refers to a document named Strategic Growth Option sites – Public Transport / Bus Service Options / Viability Study. The only published version of this on the website is a draft from June 2017 and this has been superseded by the SGO Public Transport Accessibility background paper – June 2018. That later document appears not to have been taken into account (it post dates the TA) and confirms that Option D is now found to be the best option of all.

4.2.2 The Public transport comparison is flawed in that it provides for a significant level of bus provision which goes above and beyond what might reasonably be required in terms of number of bus routes and distances. The economic appraisal therefore favours larger sites. The assessment has not therefore been undertaken on a like for like basis and the benefits of D and E are both likely understated in the assessment.

4.3 Transport Modelling and Impacts

4.3.1 The Transport Model Section is wholly new and had not been published previously in December 2015. This means there is a significant level of additional information which no parties (including we understand HCC or Winchester City Council) have had time to properly review.

4.3.2 The SGO Paper does not set out the overall objectives as required by Government guidance on the assessment. This is unfortunate because for, unknown reasons, the assessment appears to start from the premise that an SGO should be able to provide

a new strategic link. That is of course the wrong way round and infrastructure should be required to mitigate impacts only.

4.3.3 This, perversely, leads to the assessment of Options D or E not providing a Strategic Link and therefore weighing against them (see Paragraphs 6.106-1.109).

4.3.4 A proper assessment would consider whether such a scheme were required to mitigate an option and then assess the impacts of that in the round against all the planning objectives, benefits and potential impacts. They have been discounted in isolation and that is a fundamental error of process.

4.3.5 In any event, the results of the modelling presented at Table 24 demonstrate that in the baseline Option BC with the link road "do something" (Scenario DS2) actually performs worse than D or E.

4.3.6 <u>That confirms there is no wider benefit in the link road for B/C other than mitigating the impact of the development. Even in that case it is not adequate.</u>

4.3.7 The purported benefits suggested in the document at 6.134 are clearly related to the fact that delay in Fair Oak arising from a link road scenario would act as a brake to further traffic routing north. Overall the impacts are significantly worse.

4.3.8 Other following comparisons set out in Para 6.136 cherry pick statistics which purport to support Option C over the others. This is at best misleading, and at worst wholly mis-represents the overall conclusion of the model.

4.3.9 That said, the overarching assessment and indeed the formulation of the policy wording clearly establishes a need for the link road to be delivered to mitigate development impact. Any development on B/C without the link road would clearly be unacceptable.

4.3.10 Any benefit of BC over the other two options is therefore wholly dependent on the "Do More" junction improvements. These improvements are set out in Figure 11 of the Transport Assessment (**Appendix B** of this report). Taking out the Northern Link Road, the same level of mitigation is not assessed for the other options.

4.3.11 This is clearly not comparing apples with apples and the assessment process is flawed for that reason. It should be reassessed on a reasonable like for like basis. For example if the link road were not required (because development proceeded at D or E) the comparable cost of the saving in highway works could be deployed elsewhere.

4.3.12 Comparisons of delay savings highlighted in Table 24 confirm that DS2 would perform less well. Further comparisons of the benefits suggested at Para 6.117 are wholly misleading and do not provide a proper or reasonable basis for assessment. Overall total changes in delay are very comparable overall and in all cases worse if DS2 is adopted as the comparator.

4.3.13 In the absence of that work, the Local Plan should be considered by comparing all of the options with DS2 and not DS3. That comparison would demonstrably conclude that DS2 has significantly greater adverse impacts than the other options.

4.3.14 There are other clearly irrational comparisons in the document. Para 6.125 confirms that B/C is being tested for its full capacity rather than to the 2036 design horizon and suggests that the scale of the other sites should mark it down. That is not the test for this Local Plan.

4.3.15 In terms of the impact on the South Downs National Park, the assessment considers AM peak hour flows only. There is no assessment of 24 hour flows or environmental impacts. Clearly, the main impact on the Park will be amenity, noise and AQ rather than morning peak congestion. It is a failure of the assessment that it does not properly assess those impacts (in terms of 24 hour / daily flows).

4.3.16 All of the preceding assessment considers the impact at a District or Area Wide level. That assessment supports the development of Options D and E over B/C.

4.3.17 EBC provide a more detailed assessment of localised impacts (Page 70 Para 6.150 onwards). However these cover impact of the chosen option only. It is essential that this comparative assessment is undertaken properly with the appropriate mitigation for the other options.

4.3.18 This is particularly important because the conclusion at para 6.171 is that 8 junctions are predicted to experience "severe" levels of congestion. A further pertinent test would clearly be whether or not the other options result in more or less "severe" impacts.

4.3.19 That is a level at which NPPF clearly states development should be prevented. On that basis it is wholly inappropriate to exclude a similar level of assessment for the other options.

4.3.20 There are significant anomalies in the modelling outputs which raise concern over the whole validity and accuracy of the modelling work. An example of this is 7.2.17 of

the TA Part 2 which suggests traffic flows on the B3335 will actually reduce as a result of the growth.

4.4 **Overall Conclusions of Technical Assessments**

4.4.1 In conclusion of impacts, Table 34 confirms that D and E perform better than C in terms of reducing overall distance travelled. Tables 35 and 36 confirm no significant difference between the options in terms of CO2 and walking and cycling trips. In Table 36, D performs better than BC and the same is true of E.

4.4.2 Overall, it is incongruous that para 6.189 concludes that B/C performs better than D or E. That is simply not supported by the Council's own transport evidence base. The report provides no overall assessment of cumulative impacts as required by the NPPG / Webtag and therefore there is no proper assessment of that.

4.4.3 Given this, I have prepared my own summary of overall benefits based on the evidence provided by EBC which is attached at **Appendix C** and confirms that D and E both perform better.

5.0 Deliverability of the Plan

5.1 Local Plan Policy

5.1.1 Policy S5 suggests that housing will be delivered on site by 2019/2020. Although consent has been granted for some initial development is it not clear how Item 9 would relate to that. Overall the times are completely unrealistic given the requirements of item 9:

> *Development will support and not prejudice the delivery of the full link road as set out in policy S6. All phases of development will make a proportionate financial contribution to the link road. No development will be permitted until the link road (or at least phases 1-3 as defined by policy S6) has full planning permission; all the land is in the control of the developers; and there is at least a strong likelihood that the full road will be funded. Phases of development will not be occupied until phases of the link road are completed, as determined by the infrastructure delivery phasing plan.*

5.1.2 This is supported at the supporting text Paragraph 4.29 which emphasises the necessity of the link road to deliver the site.

5.1.3 Section 8 of the North Bishopstoke Bypass Feasibility Report sets out the works required to get to identification of a preferred route. That is (at least) a 2 year process. Following that a planning application (with full EIA and Appropriate Assessment) would be required. Side Orders, Traffic Regulation Orders and possibly Compulsory Purchase Orders will be required. Any of these could trigger the need for a Public Inquiry and realistically this is an additional 2 year process.

5.1.4 There is no provision within the policy for the completion of the Link Road as far as Crowd Hill when C will be effectively complete. Based on the testing at DS4 this would result in an unacceptable impact.

5.1.5 The wording that "there is at least a strong likelihood" of funding clearly does not pass any reasonable test of demonstrating deliverability. As set out in the IDP costs and funding are both considerably uncertain.

5.1.6 The Policy is unsound in that it does not identify how the overall transport needs of the development will be properly assessed at the application stage. The supporting text states:

> *The completion and occupation of dwellings can be phased so that they are only completed alongside individual phases of the link road, according to a programme*

to be determined by a detailed transport assessment and set out in the approved infrastructure and delivery phasing plan.

5.1.7 The Policy wording does not require a Transport Assessment (or Assessments specifically) nor does it refer to an "approved infrastructure and delivery phasing plan". This should be made explicit in the context of the Detailed Masterplan referred to in the Policy, as should the identification of all off-site highway works. Mention of those is omitted from the bullet headings in the Policy.

5.1.8 Policy E8 needs to be specifically expanded to cover those known impacts and locations for improvement as identified in the Transport Assessment Part 2. The reference to Transport Assessment in the policy is misleading and unclear.

5.2 **Infrastructure Delivery Plan – June 2018**

5.2.1 The schemes in the IDP exclude the works identified in the "do-more" scenario. Para 6.20 confirms that these are not yet costed. The Local Plan policy requires further assessment before there can be any certainty on the deliverability of these elements.

5.2.2 These include significant schemes, for example J12 of the M3.

5.2.3 At a strategic level there is also uncertainty about the delivery of other schemes, such as Smart Motorways, which are assumed as committed developments but which have no currently committed timetable.

5.2.4 Section 8 of the report confirms that those schemes are not included in the viability assessment and that only £36m would left "in the pot" to fund all infrastructure. In order to suggest more money might be available, the report attempts (para 8.8 -8.9) to discount Optimism Bias (OB) from the calculation.

5.2.5 To quote the Green Book "Optimism bias is the demonstrated systematic tendency for appraisers to be over-optimistic about key project parameters, including capital costs, operating costs, project duration and benefits delivery."

5.2.6 The key Local Plan test of deliverability is seriously undermined by the approach taken by EBC in this regard. The whole purpose of OB in terms of assessment is to ensure that decisions are not made which turn out to be unrealistic, and to provide robustness in the decision on deliverability.

5.2.7 The Plan is dependent on the level of infrastructure that has been identified in the transport modelling. The details of a significant proportion of that infrastructure are unknown in scale or cost. On EBC's own assessment delivery of that unknown level

of costs is dependent on some more defined works ultimately costing less to deliver than currently assessed. That situation is ludicrous and wholly fails to demonstrate that the plan as submitted is deliverable in terms of transport infrastructure.

5.2.8 There is considerable uncertainty that the IDP requirements have properly assessed the needs and costs of the development in transport terms. It is a fact that the full level of mitigation remains uncertain.

SJT/19247-02b_FInal_Review of Transport Evidence Base
6th August 2018

Appendix A

Transport evidence bases in plan making and decision taking

Why establish a transport evidence base for Local Plans?

It is important for local planning authorities to undertake an assessment of the transport implications in developing or reviewing their Local Plan so that a robust transport evidence base may be developed to support the preparation and/or review of that Plan. A robust transport evidence base can facilitate approval of the Local Plan and reduce costs and delays to the delivery of new development, thus reducing the burden on the public purse and private sector.

The transport evidence base should identify the opportunities for encouraging a shift to more sustainable transport usage, where reasonable to do so; and highlight the infrastructure requirements for inclusion in infrastructure spending plans linked to the Community Infrastructure Levy, section 106 provisions and other funding sources.

Local planning authorities should also refer to the Department for Transport's Circular 02/2013: The Strategic Road Network and the Delivery of Sustainable Development

Paragraph: 001 Reference ID: 54-001-20141010

Revision date: 10 10 2014

What is the purpose of a transport evidence base to support the Local Plan?

A robust evidence base will enable an assessment of the transport impacts of both existing development as well as that proposed, and can inform sustainable approaches to transport at a plan-making level. This will include consideration of viability and deliverability.

A robust assessment will establish evidence that may be useful in:

- improving the sustainability of transport provision
- enhancing accessibility
- creating choice amongst different modes of transport
- improving health and well-being
- supporting economic vitality
- improving public understanding of the transport implications of development
- enabling other highway and transport authorities/service providers to support and deliver the transport infrastructure that conforms to the Local Plan
- supporting local shops and the high street

Paragraph: 002 Reference ID: 54-002-20141010

Revision date: 10 10 2014

What key issues should be considered in developing the transport evidence base to support the Local Plan?

The key issues, which should be considered in developing a transport evidence base, include the need to:

- assess the existing situation and likely generation of trips over time by all modes and the impact on the locality in economic, social and environmental terms
- assess the opportunities to support a pattern of development that, where reasonable to do so, facilitates the use of sustainable modes of transport
- highlight and promote opportunities to reduce the need for travel where appropriate
- identify opportunities to prioritise the use of alternative modes in both existing and new development locations if appropriate
- consider the cumulative impacts of existing and proposed development on transport networks
- assess the quality and capacity of transport infrastructure and its ability to meet forecast demands
- identify the short, medium and long-term transport proposals across all modes

The outcome could include assessing where alternative allocations or mitigation measures would improve the sustainability, viability and deliverability of proposed land allocations (including individual sites) provided these are compliant with national policy as a whole.

Paragraph: 003 Reference ID: 54-003-20141010

Revision date: 10 10 2014

When should the transport assessment of the Local Plan be undertaken?

An assessment of the transport implications should be undertaken at a number of stages in the preparation of a Local Plan:

- as part of the initial evidence base in terms of issues and opportunities
- as part of the options testing
- as part of the preparation of the final submission

The last of these stages should highlight the scale of and priorities for investment requirements and support infrastructure spending plans. Like a sustainability appraisal, it will be an iterative process and become more refined and detailed as the process draws to a conclusion.
Paragraph: 004 Reference ID: 54-004-20141010
Revision date: 10 10 2014

What baseline information should inform a transport assessment of a Local Plan?

The following list indicates the key aspects that should be addressed in the transport assessment. This list is not exhaustive, and there may be additional issues that are important to consider locally.

- all current transport issues as they affect all modes and freight covering, for example, accessibility, congestion, mobility, safety, pollution, affordability, carbon reduction across the whole Plan area and, within relevant areas of the Plan, including existing settlements and proposed land allocations
- the potential options to address the issues identified and any gaps in the networks in the short, medium and longer term covering, for example, accessibility, congestion, mobility, safety, pollution, carbon reduction
- the locations of proposed land allocations and areas/corridors of development and potential options for the provision of sustainable transport and transport networks to serve them
- solutions to support a pattern of development that, where reasonable to do so, facilitates the use of sustainable modes of transport
- the scope and options for maximising travel planning and behavioural change.
- accessibility of transport nodes such as rail/bus stations to facilitate integrated solutions

The transport assessment should be produced at a Local Plan level in partnership with all relevant transport and planning authorities, transport providers and key stakeholders, for example, the Local Economic Partnership. It may be appropriate for the transport assessment to cover an area wider than the Local Plan at least initially given the size of some travel to work areas (this would be similar to the Strategic Housing Market Assessment). This process should help to identify any potential measures that may be required to mitigate negative impacts.
Paragraph: 005 Reference ID: 54-005-20141010
Revision date: 10 10 2014

What detailed information is required for the transport assessment of the Local Plan?

Much information required for the transport assessment will already be available, not least from the development needs and land availability assessments. Local planning authorities will need to consider the demographics of the area and also the desired or perceived changes likely to take place in the life of the Plan as they might affect the transport network.
Other considerations that could be included are:

- baseline existing conditions, which need to be established accurately to understand fully the context of the Local Plan policies and proposals
- the existing integrated transport networks and any gaps in these as well as service and quality
- opportunities to change to other forms of transport
- the current use and demand by all different types of transport including cumulative trips into and out of the area
- the availability of information from travel plans, previous assessments, transport operators etc
- capacity data on rail and tram networks and constraints across the area
- walking and cycling facilities and movements including future predicted trips
- description and functional classification of the road network
- current traffic flows including peak periods on roads, links and key junctions
- parking facilities, including any park and ride and existing under-provision of off-street parking spaces
- journey purpose of trips
- identification and assessment of key links and junctions on the highway network to establish existing conditions
- committed network improvements
- personal injury accident records, including cyclist safety
- any programmed public transport improvements including type, timing and promoter information
- pollution, including baseline carbon emissions broken down by type of travel
- existing transport-related environmental impacts
- established best practice in transport provision and the share of each type

- at a broad level, journey purpose and origin and destination currently and how it is likely to change or desired to change – for all types of transport

The above is not exhaustive, and other issues may need to be included as appropriate to give a complete baseline for the Plan area and how it will change. Early engagement between interested parties is important in agreeing the level and scope of assessment required.
Paragraph: 006 Reference ID: 54-006-20141010
Revision date: 10 10 2014

How can a transport assessment of the Local Plan be undertaken?

A transport assessment is likely to be scenario based and in terms of projections look at a range of potential outcomes given a number of assumptions, for example, a movement in the proportion of people using different forms of transport consistent with best practice.
Transport data should be included that reflects the typical (neutral) flow conditions on the network (for example, non-school holiday periods, typical weather conditions etc) in the area of the Plan, and should be valid for the intended purposes. It should also take account of holiday periods in tourist areas, where peaks could occur in periods that might normally be considered non-neutral. The recommended periods for data collection are spring and autumn, which include the neutral months of April, May, June, September and October. Further advice is available from the Highways Agency, as described for traffic in the Design Manual for Roads and Bridges (Volume 13, Part 4).
In terms of road traffic, but not other types of traffic, where there is a need to project existing or historical traffic data for future year assessments, the preferred option is the use of appropriate local traffic forecasts (such as the Trip End Model Presentation Program used for transport planning purposes), provided they offer a robust assessment. In some cases, National Road Traffic Forecast growth rates would be appropriate. However, it is important to ensure that this does not just perpetuate existing travel patterns but, where reasonable to do so, facilitates the use of sustainable modes of transport.
The use of any area-wide traffic models or background growth rates should be agreed with the relevant transport or highway authority at the evidence gathering stage of the Local Plan. Care needs to be taken when considering using any model that it takes account of the need to address historic travel patterns not necessarily reinforce them.
To assess the availability of the capacity of the road network, the transport assessment should take into account:

- recent counts for peak period turning movements at critical strategic junctions, for example, in certain instances where there is known to be a significant level of heavy goods vehicles traffic, a classified count (identifying all vehicles separately) should be provided
- 12 hour/24 hour automatic traffic counts

Additional counts that may be required on the strategic parts of the road network could include:

- manual turning counts (which should be conducted at 15 minute intervals) to identify all strategically relevant highway network peak periods
- queue length surveys at key strategic signal junctions to establish demand and actual traffic flows
- journey time surveys
- freight counts
- abnormal load counts
- pedestrian and cyclists counts

Capacity assessments for roads, rail and bus should also be obtained.
Paragraph: 007 Reference ID: 54-007-20141010
Revision date: 10 10 2014

How should the impact of land allocations be considered in assessing the transport implications of Local Plans?

The first step in quantifying the impact of proposed land allocations in the Local Plan on the transport system is to provide an estimate of the person trips (for all types of transport) that are likely to be generated by it.
In all cases, an analysis of development-related trips using an appropriate database or an alternative methodology should be agreed with the relevant highway authorities, as this will form the major element of the assessment.
An assessment of the impacts of the proposed additional land allocations can be initiated once initial potential allocations have been determined. There needs to be a description of the type of development at each of the locations proposed in as much detail as possible at the time. Where this is not possible,

a "likely" scenario will need to be employed to set out the potential transport impact. Information that could be required includes:

- location plans of each site
- description of all the proposed land uses
- scale of development – such as the number of residential units or gross floor area of development – subdivided by land use where appropriate/possible
- site area in hectares
- likely proposed access to existing transport infrastructure for all types of travel
- where known, the likely proposed parking strategy
- development phasing, where applicable
- potential for securing travel planning benefits and enhanced sustainable transport provision

The above requirements are not exhaustive and will require adaptation to reflect the knowledge about the potential site allocations and developments as well as the type and scale of the proposed developments.

Paragraph: 008 Reference ID: 54-008-20141010
Revision date: 10 10 2014

How should safety considerations be addressed and accident analysis used effectively in the transport assessment of the Local Plan?

All types of transport should be covered by safety considerations and accident analysis, taking into account the objective of facilitating, where reasonable to do so, the use of sustainable modes of transport. The level of detail required will be dependent on the stage of the Local Plan.

The transport assessment should identify any significant highway safety issues and provide an analysis of the recent accident history of the affected/impacted areas. The extent of the safety issue considerations and accident analysis will depend on the scale and type of developments in the context of the character of the affected Strategic Road Network. The need to minimise conflicts between vehicles and other road user groups should be adequately addressed.

Critical locations on the road network with poor accident records should be identified. This is to determine if the proposed land allocations will exacerbate existing problems and whether highway mitigation works or traffic management measures will be required to alleviate such problems. The accident records should be compared with accident rates on similar local roads.

Where the Strategic Road Network is involved, we recommend that appropriate national statistics are also used as a comparison.

Paragraph: 009 Reference ID: 54-009-20141010
Revision date: 10 10 2014

How is the WebTAG approach useful in the transport assessment of the Local Plan?

An assessment should adopt the principles of WebTAG by assessing the potential impacts of development within the framework of WebTAG objectives. For most Local Plan assessments the full methodology recommended will not be appropriate. The Highways Agency's Project Appraisal Report System may provide some useful guidance on methods more appropriate in these cases. Assessments involving major new transport infrastructure should, however, employ the methods set out in WebTAG.

Although this approach is typically applied when planning for local transport infrastructure, adopting this approach for Local Plan transport assessments will ensure that any proposed land allocation impact is considered in the context of two alternative scenarios – 'with development' and 'without development' – and will enable a comparative analysis of the transport effects of the proposed allocation.

Paragraph: 010 Reference ID: 54-010-20141010
Revision date: 10 10 2014

Department for Transport

TRANSPORT ANALYSIS GUIDANCE

The Transport Appraisal Process

January 2014

Department for Transport

Transport Analysis Guidance (TAG)

https://www.gov.uk/transport-analysis-guidance-webtag

This TAG Unit is guidance for the **TECHNICAL PROJECT MANAGER**

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2 Option Development (Stage 1)

2.1 Introduction

2.1.1 This Section describes Stage 1 of the transport appraisal process - Option Development (Figure 1). **It is applicable to all types of intervention, including individual schemes, packages of measures, strategies and plans.**

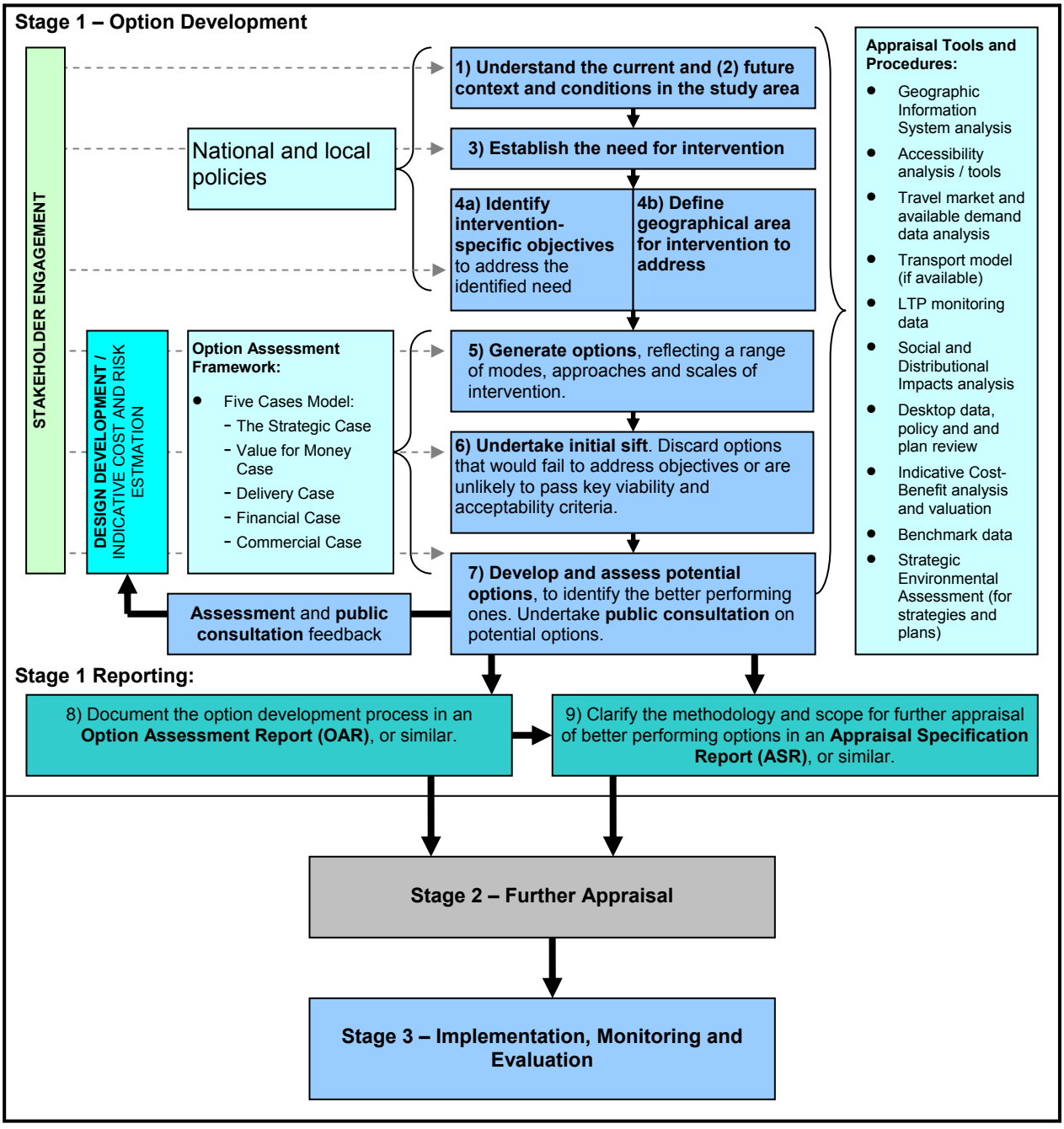
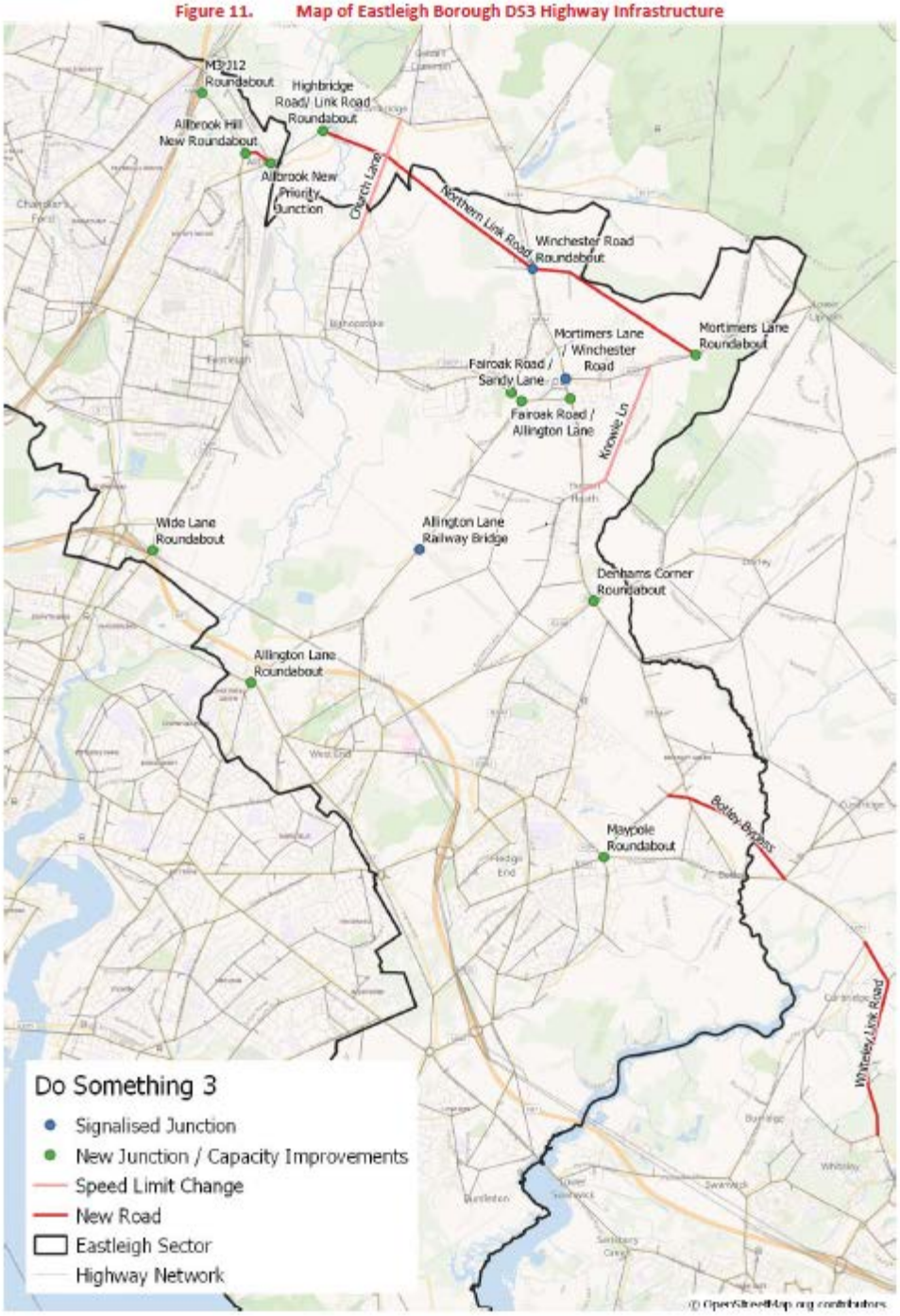


Figure 1 Steps in the Stage 1 process

2.1.2 Stage 1 involves identifying the need for intervention and developing options to address a clear set of locally developed objectives. It involves generating a broad range of options, which reflect a range of modes, approaches and scales of intervention. These are then sifted and assessed against criteria from the **Transport Business Case** (DfT, 2011) 'Five Case Model' to identify the better performing options for further appraisal in Stage 2. The focus of assessment is on developing a transparent and appropriate view of the relative merits and disadvantages of different options.

Appendix B

Figure 11. Map of Eastleigh Borough DS3 Highway Infrastructure



Appendix C

	Option B/C		Option D		Option E	
Test	DS2, 3 and 4		DS5 , DS7		DS6	
Objective	Comment	Score	Comment	Score	Comment	Score
Existing Car Ownership	Not relevant	0	Not relevant	0	Not relevant	0
Accommodation of Facilities	Ranked highly because of ability to provide more housing and more facilities. No assessment is provided as to the right balance. (i.e. is there too much employment here which will generate further inbound trips).	0	Proportionally provides similar levels of employment and local centres & no obvious reason why they could not provide more if that were appropriate. Secondary school has limited peak hour traffic so benefits over-stated. Could be provided on site if needed.	0	Proportionally provides similar levels of employment and local centres & no obvious reason why they could not provide more if that were appropriate. Secondary school has limited peak hour traffic so benefits over-stated. Could be provided on site if needed.	0
Location in terms of existing retail facilities.	Assessment suggests that significant out movements for existing shopping will be reduced by new facilities as result of further development. All assessment based on spent and no proper assessment of impacts / changes other than subjective views.	1	Option D would only sustain a smaller centre in itself, both in terms of its population base and its physical capacity. It is possible that it could be made larger to also serve the existing community. Overall must be at worse neutral. Table 12 confirms D to perform better than B/C	1	West End has more facilities but it is suggested is less likely to provide wider benefit. There is not transport planning objective that requires wider benefit to be demonstrated	0
Access to wider facilities and jobs	Assessment is fundamentally flawed, based on access to nearest centre rather than access to where people want to travel.	0	On a weighted balance of distances (Table 13), D scores better.	1	On a weighted balance of distances (Table 13), D scores better.	1
Access to wider retail	Conclusion is all are similarly matched (albeit D and E have slight benefit over BC.	0	Agreed	1	Agreed	1
Public Transport Rail - Existing	Dependant on Eastleigh / Soton Parkway	0	Comparable	0	Closer to Hedge End and Parkway.	1
Rail Future	No possible improvement potential	-1	Possible improvement potential. Criticism is no assessment of feasible but this would be a further benefit not critical to scheme being acceptable.	0	Possible improvement potential. Criticism is no assessment of feasible but this would be a further benefit not critical to scheme being acceptable.	0
Bus	Baseline for all options is need for significant change to provision. Assessment assumes need for 5 new routes which significantly over-estimates demand and reasonable requirement.	0	"It is considered likely that SGO D generates the greatest benefit because its new bus route is based on the shortest distance to a key destination (Eastleigh), creating an attractive journey time." Table 36 confirms best performing option.	2	Brookbanks assessment shows long term viability for 2 new services. That would be cost positive by year 6. (Figure 7e). Site is more centrally located than B and two routes would adequately meet identified demand.	1
Traffic Congestion	It is clear that no significant improvement to wider network and bypass is at best mitigation. Provides no wider benefit. B/C is dependant on do-more scenario. No certainty on delivery of infrastructure so must score negative	-2	Confirms performs better than BC Do something	1	Confirms performs better than BC Do something	1
	Total	-2		6		5

Large beneficial (+++);	3
Moderate beneficial (++);	2
Slight beneficial (+);	1
Neutral (0);	0
Slight adverse (-);	-1
Moderate adverse (--);	-2
Large adverse (---).	-3